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Proposed Attorneys for Debtor and Debtor in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re: NOAH OPERATIONS RICHARDSON TX, LLC; NOAH OPERATIONS SUGARLAND TX, LLC; NOAH OPERATIONS CHANDLER AZ, LLC; and NOAH CORPORATION, Debtors.	Bankruptcy Case No. 19-23492 Bankruptcy Case No. 19-23571 Bankruptcy Case No. 19-23810 Bankruptcy Case No. 19-23840 (Jointly Administered) Chapter 11 Honorable R. Kimball Mosier
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**NOTICE OF HEARING ON MOTION FOR ORDER PURSUANT TO 11 U.S.C. § 366
(I) PROHIBITING UTILITIES FROM ALTERING, REFUSING, OR DISCOUNTING
SERVICES TO, OR DISCRIMINATING AGAINST, THE DEBTOR;
(II) PROVIDING THAT A SINGLE DEPOSIT FOR ALL THE DEBTOR'S
UTILITIES SHALL CONSTITUTE "ADEQUATE ASSURANCE OF FUTURE
PAYMENT"; AND (III) ESTABLISHING PROCEDURES FOR DETERMINING
REQUESTS FOR ADDITIONAL ASSURANCE**

**OBJECTION DEADLINE: THURSDAY, JUNE 13, 2019, 5:00 P.M. MST
HEARING DATE: FRIDAY, JUNE 14, 2019, 10:00 A.M., MST**

PLEASE TAKE NOTICE that on June 4, 2019, Debtor, Noah Corporation (the
“Debtor”) filed a Motion For Order Pursuant To 11 U.S.C. § 366 (I) Prohibiting Utilities from
Altering, Refusing, or Discounting Services to, or Discriminating Against, the Debtor;

(II) Providing that a Single Deposit for all the Debtor's Utilities Shall Constitute "Adequate Assurance Of Future Payment"; and (III) Establishing Procedures for Determining Requests for Additional Assurance (Dkt. 29) (the "Motion"). A copy of the Motion is served herewith.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read this Notice and the Motion carefully and discuss them with your attorney in this adversary proceeding.

PLEASE TAKE FURTHER NOTICE that, if you do not want the Bankruptcy Court to grant the Motion in whole or in part, or if you want the Bankruptcy Court to consider your views on the Motion, then you or your attorney must file with the Bankruptcy Court a written objection to the Motion in conformity with Rules 7056-1(c), (d), and (g) of the Bankruptcy Court's local rules of practice so that it is **received** no later than **June 13, 2019 at 5:00 p.m. MDT**. Your objection must be filed at:

Clerk
United States Bankruptcy Court
350 South Main Street
Salt Lake City, UT 84101

Copies of objections must be served on the counsel for the Debtor listed below.

PLEASE TAKE FURTHER NOTICE that the Motion will come on for hearing before the Honorable Joel T. Marker, United States Bankruptcy Judge, on **Friday, June 14, 2019, at 10:00 a.m., MST**, in room 341 in the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah. Failure to attend the hearing will be deemed a waiver of your objection. You may participate telephonically in the hearing by dialing the Court's conference line 10 minutes prior to the scheduled hearing time set forth above. The conference line number

is 801 524-2013 (ext. 21120#). You may participate in the hearing whether or not you file an objection as set forth above.

PLEASE TAKE FURTHER NOTICE that, if you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief sought in the Motion without a hearing. Pursuant to Rule 9013-1(d) and (f) of the Court's local rules of practice, absent timely filing and service of objections to the Motion, the Debtor may request that the Court grant the Motion without further notice or hearing.

DATED this 6th day of June, 2019

DURHAM JONES & PINEGAR, P.C.

By: /s/ Penrod W. Keith
Kenneth L. Cannon II (3705)
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Debtor and Debtor in Possession